Before the

Federal Communications Commission

Washington D.C. 20554

In the matters of:

Facilitating the Deployment of Text-to-911 And Other Next Generation 911 Applications	))	P.S. Docket No. 11-153
Framework for Next Generation 911 Deployment	)))	P.S. Docket 10-255

Comments by Rave Mobile Safety on Proposed Rule Making

Rave Mobile Safety ("Rave") respectfully submits these comments to the Notice of Proposed Rule Making ("NPRM") released by the Federal Communications Commission ("FCC") September 22, 2011.

Rave's relevant experience with emergency text communications and NG9-1-1 includes the following:

1) Nation's only Call-then-Text solution deployed at dozens of PSAPs across 20 states. This solution provides call takers with the ability to communicate via 2-way SMS with 9-1-1 callers in the event then deem it necessary (e.g. caller has pre-subscribed as deaf or hard of hearing, or a silent witness scenario is identified)
2) SMS Crime Tip solution deployed at numerous colleges and universities nationwide. This solution provides a means for 2-way communication between the community and the public safety agency via an SMS shortcode. This service is not promoted for emergency communications for reasons clarified below.
3) As a leading provider of Emergency Notification Solutions, Rave delivers millions of SMS messages each month and has years of data tracking delivery rates for both Mobile Originated (MO) and Mobile Terminated (MT) SMS messages.
4) Rave is the only national provider of additional caller data for 9-1-1 callers, with over 60 deployments across 20 states. The solution has been endorsed by many Deaf and Hard of Hearing Advocacy groups as a means to streamline the process of communication between those communities and public safety.
5) Rave is currently piloting the nation's first Real-time Text (RTT) application using SIP and RTP protocols as detailed in NENA's i3 architecture.
6) Rave's Senior Director of Product Management currently chairs NENA's i3 Additional Data Working Group.

Any Interim Solution Must Not Impede Progress Toward the Best Solution

Through our experience with Emergency Text communications, Rave and our clients have seen some of the challenges involved with existing, primarily SMS based, technologies. While still a viable interim option, inherent delays and "out of order" messaging delivery in this non-synchronous communication method can be frustrating or worse. If an interim solution utilizing a specific technology (e.g. SMS) were mandated, vendors would be dissuaded from aggressively developing other promising technologies such as RTT which have the potential to be both a near term and long term solution for Text and other media forms.

We also believe any interim solution which will require a behavior change for a large segment of the population, and then re-education as the ultimate solution is deployed, is not in the best interest of public safety agencies or the citizens they support. Churn should be minimized across the board. We recommend a phased approach with an initial focus on the deaf and hard of hearing population. Targeting the deaf and hard of hearing community will address the neediest community first, while allowing for the development of technology and operational processes required to support text-based 9-1-1 communications for all citizens.

In summary, we fully support regulatory action to enable the Deaf and Hard of Hearing population equal access to emergency communications via mobile devices; however, we caution against mandating a specific interim technical approach for a even broader population group while potentially also stagnating incentives to development towards a more robust solution.

Additional Data Associated with Callers

Rave has years of experience delivering validated additional information to PSAPs with emergency calls. This data ranges from medical conditions, allergies, bedroom locations to disability information on callers. This information has proven time and time again to be life saving and greatly speed the call taking process where the caller is not able to effectively communicate. In (74), the commission seeks comment on ". . . benefits of providing validated additional information to PSAPs . . .". We strongly believe the value of this data and the need to support its delivery to emergency services, should be considered core to NG9-1-1. Additionally, our clients report a strong desire to ensure additional data is collected and delivered with any Text-to-911 solution. In an emergency, seconds count. Communication over Text has inherent differences that are not part of traditional voice calls. For example, a call taker has no context of the caller's age, sex, or even whether the caller is texting because they are deaf or just chose to. The delivery of such contextual information is an inherent part of voice communication. This type of additional data should be delivered regardless of the call type. We encourage the FCC to promote extending the same sort of liability protection afforded traditional 9-1-1 communications to vendors providing additional caller data.

Caller Location

The commission requested comment on the following:

"…would it be technologically feasible for the recipient of an emergency SMS, such as the ALI database provider, to query for the location using the phone number provided, assuming that it can identify the originating provider?"

Rave currently enables this capability for our clients for approximately 75% of mobile devices across the leading wireless carriers. Location accuracy results are affected by a number of factors, including: local network coverage, the specific carrier/handset technology, and whether the caller is indoors or outdoors. Often we find the level of location accuracy available to be on par with a phase 2 E911 request, but not always. With permission of our carrier partners this commercial

cross-carrier network based location access could be exposed and utilized not only by Rave but by other providers of emergency text communications. There are a few factors to consider:

1) In many instances, the commercial location gateways are not as robust as the emergency location services. Access to the location services must be continually monitored and maintained in order to ensure availability
2) Most of the smaller wireless service providers have not exposed commercial network based location platforms
3) Location is only available with prior consent of the caller and requires pre-registration (this also enables easy identification of the originating mobile service provider). Rave maintains a cross carrier permissions database providing callers with a means to manage their location permissions.

Liability

The path to NG9-1-1 will require all constituents (citizens, technology providers, public entities, and others) to adopt technologies not previously used for public safety communications. If the United States is to achieve an expedient and competitive transition to NG9-1-1, it is vital that we not set a precedent where entities choosing to develop and adopt new technologies are placed at a higher level of liability than those who slow down or avoid deploying improvements to public safety communications.

Rave strongly encourages the FCC to ensure liability protections afforded to existing 9-1-1 service providers are expanding to include the definitions of new forms of communication (such as text and additional data).

Conclusion

We appreciate the opportunity to submit comments in this proceeding and look forward to continued leadership by the FCC on these critically important matters.

Respectfully submitted,

Rave Mobile Safety

By: /s/

Todd Piett
Chief Product Officer
Rave Mobile Safety
50 Speen Street
Suite 301
Framingham, MA 01701
(508) 848-2484

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